

PRIVACY POLICY

Privacy and Gyrostat Capital Management Pty Ltd

Gyrostat Capital Management Pty Ltd (**Gyrostat**, 'we' or 'our') understands the importance of keeping any personal information we may receive about you secure and confidential.

This privacy policy sets out how Gyrostat collects, uses, manages and discloses personal information and how Gyrostat aims to protect the privacy of your personal information.

Gyrostat may update this privacy policy (**Privacy Policy**) from time to time.

Privacy Act and personal information

The Privacy Act 1988 (Cth) (**Privacy Act**) and the relevant privacy principles under the Privacy Act regulate how private sector organisations can collect, store, manage, use, disclose and provide access to personal information.

For the purposes of the Privacy Act, personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Reasons for collecting personal information

Gyrostat collects personal information primarily for the purpose of providing our funds management services and conducting our funds management business. This may involve collecting personal information from you to:

- a) process an investment application from you and establish your investments in our funds or other financial products;
- b) manage our relationships with you and administer any investment you have with us, including communicating with you (including to a joint holder or other beneficiaries or dependents) about the investment;
- c) monitor and evaluate our investment products or other products or services;
- d) provide you with access to our website and other online services;
- e) respond to queries you submit to us;
- f) provide you with information about our funds, investments, products or services that may be of interest to you;
- g) accounting, billing, audit, insurance and other internal administrative purposes;
- h) comply with our legal requirements under any applicable laws, including anti-money laundering legislation and any other legal requirements which we must comply with or any voluntary code(s) we decide to adopt or good practice (domestic or international) or prudential guidelines;
- i) assist in arrangements with other organisations (such as distribution partners and authorised representatives) in relation to the promotion or provision of an investment;
- j) manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, staff training and market or customer satisfaction research);
- k) consider any concerns or complaints you raise against us and/or to manage any legal action between you and us; and
- l) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct.

You are not required to provide your personal information to us. However, if you do not provide personal information to us where requested (or provide inaccurate or incomplete information) we may not be able to process your application for investment in our funds or other products or otherwise provide services to you. It is not compulsory for you to provide a TFN. However, without your TFN or relevant exemption information, withholding tax may be deduced from distributions at the highest marginal tax rate (plus Medicare levy).

Joint applicants will be assumed to be joint tenants unless otherwise specified.

How Gyrostat collects Personal Information

Gyrostat collects personal information regarding investors (or prospective investors), such as a person's name, date of birth, address, telephone number, e-mail address, driver's licence details, passport details, tax file number, bank account details, investment information and employment information.

Generally, Gyrostat will collect this personal information directly from you, for example by requesting that you provide the information when you fill out an application form or submit an online form to us.

There may be other occasions when we collect personal information about you or from other sources, such as from a publicly maintained record or from an information services provider, for example where we are required to verify your identity under anti money laundering legislation.

Disclosure of your personal information by Gyrostat

From time to time we may need to disclose personal information regarding you to a third party.

The types of third parties to which we may disclose personal information include:

- a) our employees, board members, directors, officers or representatives;
- b) other insurers or distribution partners as required to carry out activities such as administering or managing an investment or managing a claim;
- c) our business partners (including their employees, directors, officers, sub-contractors or representatives), including for example a corporate or alliance partner or distributor (such as a company that referred you to Gyrostat)
- d) your financial advisers or other professional advisers or other persons you have authorised to act on your behalf;
- e) service providers (including their employees, directors, officers, sub-contractors or representatives) that we engage to assist us in our business, such as to provide accounting, custody, administration, technology, auditing, tax, legal mailing, printing, registry, application processing, identity verification or other services. Such service providers include accountants, auditors, legal advisors, rating agencies, asset consultants, investment managers, valuation agents, mediators, custodians, fund and registry administrators, brokers and dealers, IT providers, suppliers, professional advisers, image and document management service provider or mailing houses, web portal providers, data reporting services and statistical services;
- f) regulatory or government authorities (where required to by law) and law enforcement bodies, such as tax authorities or the police;
- g) our professional advisers (including legal and accounting firms, auditors, consultants, insurance brokers and other advisers);
- h) our related companies. The business activities of the Gyrostat Group are performed by various business functions which will sometimes require the exchange of information between various GCM entities;
- i) the responsible entity and fund administration entities for funds (including registered or unregistered managed investment schemes, unit trusts or collective investment schemes) where we (or a Gyrostat Group Entity) act as investment manager or investment advisor (such as the custodian, registry services provider and fund administrator);
- j) entities appointed by you where we (or a Gyrostat Group Entity) provide investment advisory or investment management services to you such as your broker, custodian or financial advisor;
- k) governmental regulators, authorities or agencies such as the Australian Tax Office, the Australian Securities and Investments Commission, Office of the Australian Information Commissioner, the Australian Competition and Consumer Commission and their state and territory equivalents;
- l) investor directed portfolio services (IDPS) platforms or IDPS look-alike platforms which list a fund or managed investment scheme managed by us (or a Gyrostat Group Entity) and/or where we (or a Gyrostat Group Entity) act as responsible entity; and

- m) other third parties as required to carry out activities such as assessing a claim or complaint, another party involved in a court action or a claim (such as a third party claimant or witness), dispute resolution bodies including the Australian Financial Complaints Authority, external administrators, arbitrators, mediators, other dispute resolution bodies, foreign and domestic courts and tribunals), other custodians or trustees and interested parties on an investment (for example a bank funder, a security provider, a broker, dealer or market participant, a beneficiary or a dependent.

Any such disclosures will be made on a confidential basis and, where possible, will require the third party to comply with appropriate privacy obligations.

When do we disclose personal information to overseas entities?

In accordance with the purposes for which we have collected your personal information, we may disclose your personal information to a party located outside Australia. For example, we may disclose your personal information outside Australia:

- a) for Gyrostat Group wide activities and reporting purposes;
- b) for investment or claims referrals to other Gyrostat Group companies;
- c) for information technology / system administration purposes;
- d) for investment purposes;
- e) to manage or administer an investment; and
- f) to communicate with you regarding an investment provided to you.

The countries where the person or company is likely to be located include the European Union, United States of America, United Kingdom, Canada, China, Hong Kong, Japan, New Zealand, and Singapore. Also, as a global manager, in some cases we may disclose your personal information to another Gyrostat entity outside Australia.

Such overseas recipients may not be bound by the Privacy Act. You acknowledge that by consenting to Gyrostat disclosing your personal information to overseas recipients, Australian Privacy Principle 8.1 will not apply to the disclosure. This means that Gyrostat will not be required to take reasonable steps in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to that personal information and as a result Gyrostat may not be liable under the Privacy Act if the recipient does not act consistently with the Australian Privacy Principles. By completing the Application Form, you consent to disclosures to overseas recipients.

Security of your personal information

Gyrostat takes all reasonable steps to protect the personal information we hold about you from misuse and loss and from unauthorised access, modification or disclosure.

Gyrostat has in place a number of data security, information security and other similar security policies and procedures. These policies and procedures are regularly reviewed to ensure they remain current and appropriate.

Accessing Personal Information

Under the Privacy Act, you have a right to access your personal information that is collected and held by Gyrostat.

If you would like to access or change the personal information Gyrostat holds about you, can contact Gyrostat and request the relevant change or access. To action any change or access request, we will need to verify your identity and comply with our other procedures which are in place to prevent unauthorised access to personal information.

We will take all reasonable steps to provide access to, or change, your personal information within 30 days from your request.

Gyrostat will not normally charge you any fees or costs for access to, or to change, your personal information. Fees or costs may apply if providing you with access to, or to change your, personal information would require us to incur retrieval or other out of pocket costs. We will notify you if any such fees or costs would be payable.

How does GCM use cookies & digital tools?

A cookie is a small, text-based file used frequently on some websites and portals. They can be permanently stored on your hard drive (persistent cookie) or in your computer's memory (session cookie). Gyrostat uses session cookies to interact with your browser. They are designed to assist and streamline the exchange of information

between your computer's browser and our computer systems. For example, a session cookie is created after you log in with your user-name and password and your access is authenticated. The session cookies assist in validating that Gyrostat's computer is communicating with your web browser throughout the time you access the Gyrostat website during the session. When you end the session by logging off or closing the browser, the session cookie is rendered inoperable.

Other cookies used by Gyrostat collect information about the use of Gyrostat website. The information collected includes where visitors connect from, what version of browser they use and their path through the Gyrostat website. In some circumstances, cookies can also provide information to identify a person. It helps us to provide personalised features and to meet online expectations of our clients, to improve our investments, as well as keep our content fresh and relevant.

When you apply for an investment using our website or our online application forms, Gyrostat collects personal information about you as a part of your application. Once you submit your application online, Gyrostat may use cookies, which in this case may personally identify you through your application information, to identify traffic source, to improve our website and your customer experience, as well as to keep our content fresh and relevant.

Gyrostat may also use third party remarketing cookies e.g. through Google AdWords, LinkedIn Insight Tag and Facebook Ads. These cookies allow us to display tailored advertising to you on different websites across the internet and on social media platforms based on your prior visits to our website. GCM and some of these third parties may also use the information to optimise ad selection for groups of individuals based on age, gender, interests and past visits to sites. Importantly, we do not collect any identifiable information about you through this remarketing process nor combine the anonymous information with personally identifiable information. You can opt out by managing your settings on such third party sites:

The use of cookies, however, is ultimately governed by you, as you can choose if and how a cookie can operate by configuring certain preferences and options in your browser. Choosing to disable cookies may mean you are not able to access all features of the Gyrostat website.

We utilise web analytics reporting software to report and measure traffic patterns to, from and within the Gyrostat website. The tracking technology collects various information, such as the visitor's domain name and IP address, which pages are visited, the number of unique visitors, paths taken within the Gyrostat website, duration of visits and entry/exit points to the Gyrostat website. A User ID may be assigned to an individual user to track engagement from one or more sessions initiated from one or more devices.

We use the aggregated reporting provided by web analytics to better manage, analyse and develop our websites, as well as to improve customer experience and improve our investments.

When you apply for an investment using our website or our online application forms, Gyrostat collects personal information about you as a part of your application. Gyrostat may use web analytics reporting software with this data to help us improve the investments we provide. All personal information collected and held will be in accordance with this Privacy Policy.

How will we retain your personal information?

We will only retain your personal information for as long as, in our reasonable opinion, is necessary to comply with applicable law or for the purposes for which we process your personal information (as set out in this Privacy Policy).

When we no longer need your personal information, we will seek to delete, destroy or de-identify it in accordance with our current record retention policies and any applicable legal and regulatory requirements.

Eligible data breach

Our service providers are required to notify us of any unauthorised access, disclosure or loss of personal information. In such a circumstance, GCM performs an assessment to determine if there has been an 'eligible data' breach' whereby the access or disclosure of the personal information is likely to result in serious harm to the individuals to whom the information relates. If GCM determines that there has been an 'eligible data breach' then the individuals affected will be notified as soon as practicable of the details of the breach and the recommended steps to take in response to it. If required, GCM will also inform the Office of the Australian Information Commissioner at the same time.

Marketing and Privacy

As part of our investments to you, we may use personal information we have collected about you to identify an investment that may benefit you. We may contact you from time to time to let you know about new or existing investments. We may also disclose your personal information to our related entities or business partners to enable them to tell you about an investment. You can contact us at any time if you do not want to receive marketing information from us.

We do not sell or pass mailing lists on to any third parties other than our distributors.

Which Companies are covered by this Privacy Policy?

Gyrostat Capital Management Pty Ltd (ABN: 19 138 219 002); (AFS Licence No: 452917).
Gyrostat Capital Management Advisers Pty Ltd (ABN: 56 168 737 246).
All Gyrostat Group Companies.

Privacy complaints

If you believe that Gyrostat has contravened the Privacy Act or have any other privacy complaint regarding Gyrostat, you can make a complaint by contacting our Privacy Compliance Manager (the contact details for our Privacy Compliance Manager are below).

Gyrostat will seek to resolve any privacy complaints and will deal with privacy complaints as quickly as possible and in a respectful and confidential manner.

Gyrostat will investigate any privacy complaint you make and will inform you of the outcome of your complaint following the completion of the investigation.

In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Federal Office of the Privacy Commissioner.

How to contact us

For further information or enquiries regarding your personal information, please contact the Gyrostat Capital Management Privacy Compliance Manager at info@gyrostat.com.au or on (03)86781742.

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